

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: ) CHAPTER 13 PROCEEDINGS  
Arlo H. Hall )  
Bynetta R. Hall ) CASE NO.: 17-12667  
 ) JUDGE PRICE SMITH  
 )  
Debtor ) **OBJECTION TO NOTICE OF**  
 ) **MORTGAGE PAYMENT CHANGE**

Now comes the Debtors and object to the Notice of Mortgage Payment Change filed by Mr. Cooper on behalf of US Bank, NA. The Notice of Mortgage Payment Change, indicates that the Debtor's property taxes are doubling to \$6,910.93, when in fact, the Debtor's property taxes are \$6,752.82 (See current tax bill attached). Moreover, the Debtor's escrow for property taxes has been approximately \$7,000.00 per year. Based on a calculation error, the creditor wishes to add \$1,114.30 to the debtor's monthly payment. As such, the Debtor objects to this Notice of Mortgage Payment Change.

Respectfully Submitted:

/s/ Jonathan I. Krainess  
Jonathan I. Krainess (0073093)  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 6, 2020, a true and correct copy of the above Objection was served via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

-Jonathan I. Krainess, on behalf of Samuel L. Feldman, Debtor, at  
[jkrainess@sbcglobal.net](mailto:jkrainess@sbcglobal.net)  
-Lauren A. Helbling, Chapter 13 Trustee, at [Ch13trustee@ch13cleve.com](mailto:Ch13trustee@ch13cleve.com);  
-Christopher Giacinto, Esq. on behalf of Mr. Cooper/US Bank, NA at  
[bkcrm@padgettlawgroup.com](mailto:bkcrm@padgettlawgroup.com);

/s/ Jonathan I. Krainess  
Jonathan I. Krainess, Esq.

**Primary Owner** HALL, ARLO & BYNETTA  
**Property Address** 150 Creekside DR CLEVELAND, OH 44125  
**Tax Mailing Address** LERETA 1123 S PARKVIEW DR COVINA, CA 91724  
**Legal Description** TR 1 3 SL 24G FF 54.71 170.97D 0.172AC Valley Ranch Estates Resub  
**Property Class** SINGLE FAMILY DWELLING  
**Parcel Number** 543-39-066  
**Taxset** Garfield Hts  
**Tax Year** 2019

**Assessed Values**  
 Land Value \$8,650  
 Building Value \$47,530  
 Total Value \$56,180  
 Homestead Value \$

**Market Values**  
 Land Value \$24,700  
 Building Value \$135,800  
 Total Value \$160,500

**Flags**  
 Owner Occupancy Credit N  
 Homestead Reduction N  
 Foreclosure N  
 Cert. Pending N  
 Cert. Sold N  
 Payment Plan N

**Half Year Charge Amounts**  
 Gross Tax \$3,783.44  
 Less 920 Reduction \$211.95  
 Sub Total \$3,571.49  
 10% Reduction Amount \$336.55  
 Owner Occupancy Credit \$0.00  
 Homestead Reduction Amount \$0.00  
 Total Assessments \$141.47  
 Half Year Net Taxes \$3,376.41

**Rates**  
 Full Rate 134.69  
 920 Reduction Rate .05602  
 Effective Rate 127.144652

**Escrow**  
 Escrow N  
 Payment Amount \$0.00

	Charges	Payments	Balance Due
Tax Balance Summary	\$6,752.82	\$3,376.41	\$3,376.41

**2019 (pay in 2020) Charge and Payment Detail**

Taxset	Charge Type	Charges	Payments	Balance Due
Garfield Hts.				
	1st half tax	\$3,234.94	\$3,234.94	\$0.00
	1ST HALF BALANCE	\$3,234.94	\$3,234.94	\$0.00
	2nd half tax	\$3,234.94	\$0.00	\$3,234.94
	2ND HALF BALANCE	\$3,234.94	\$0.00	\$3,234.94
C100300-Sewer Maintenance				
	1st half tax	\$60.50	\$60.50	\$0.00
	1ST HALF BALANCE	\$60.50	\$60.50	\$0.00
	2nd half tax	\$60.50	\$0.00	\$60.50
	2ND HALF BALANCE	\$60.50	\$0.00	\$60.50
M2841920-GARBAGE COLLECTION GARFIELD HE				
	1st half tax	\$72.00	\$72.00	\$0.00
	1st half SPA fee	\$0.72	\$0.72	\$0.00
	1ST HALF BALANCE	\$72.72	\$72.72	\$0.00
	2nd half SPA fee	\$0.72	\$0.00	\$0.72
	2nd half tax	\$72.00	\$0.00	\$72.00
	2ND HALF BALANCE	\$72.72	\$0.00	\$72.72
C100300S-SEWER MAINTENANCE				
	1st half tax	\$8.25	\$8.25	\$0.00
	1ST HALF BALANCE	\$8.25	\$8.25	\$0.00
	2nd half tax	\$8.25	\$0.00	\$8.25
	2ND HALF BALANCE	\$8.25	\$0.00	\$8.25
Total Balance		\$6,752.82	\$3,376.41	\$3,376.41

\* Taxes are updated within the hour

**Primary Owner** HALL, ARLO & BYNETTA  
**Property Address** 150 Creekside DR CLEVELAND, OH 44125  
**Tax Mailing Address** CORELOGIC 2500 WESTFIELD DR ELGIN, IL 60124  
**Legal Description** TR 1 3 SL 24G FF 54.71 170.97D 0.172AC Valley Ranch Estates Resub  
**Property Class** SINGLE FAMILY DWELLING  
**Parcel Number** 543-39-066  
**Taxset** Garfield Hts.  
**Tax Year** 2016

**Assessed Values**  
 Land Value \$5,880  
 Building Value \$52,430  
 Total Value \$58,310  
 Homestead Value \$

**Market Values**  
 Land Value \$16,800  
 Building Value \$149,800  
 Total Value \$166,600

**Flags**  
 Owner Occupancy Credit N  
 Homestead Reduction N  
 Foreclosure N  
 Cert. Pending N  
 Cert. Sold N  
 Payment Plan N

**Half Year Charge Amounts**  
 Gross Tax \$4,157.21  
 Less 920 Reduction \$105.26  
 Sub Total \$4,051.95  
 10% Reduction Amount \$381.80  
 Owner Occupancy Credit \$.00  
 Homestead Reduction Amount \$.00  
 Total Assessments \$127.72  
 Half Year Net Taxes \$3,797.87

**Rates**  
 Full Rate 142.59  
 920 Reduction Rate .025319  
 Effective Rate 138.979759

**Escrow**  
 Escrow N  
 Payment Amount \$.00

	Charges	Payments	Balance Due
Tax Balance Summary	\$7,595.74	\$7,595.74	\$0.00

**2016 (pay in 2017) Charge and Payment Detail**

Taxset	Charge Type	Charges	Payments	Balance Due
Garfield Hts.	1st half tax	\$3,670.15	\$3,670.15	\$0.00
	1ST HALF BALANCE	\$3,670.15	\$3,670.15	\$0.00
	2nd half tax	\$3,670.15	\$3,670.15	\$0.00
	2nd half penalty	\$0.00	\$0.00	\$0.00
	2ND HALF BALANCE	\$3,670.15	\$3,670.15	\$0.00
<b>M284192-REFUSE COLLECTION</b>	1st half tax	\$72.00	\$72.00	\$0.00
	1st half SPA fee	\$72.00	\$72.00	\$0.00
	1ST HALF BALANCE	\$72.00	\$72.00	\$0.00
	2nd half penalty	\$0.00	\$0.00	\$0.00
	2nd half tax	\$72.00	\$72.00	\$0.00
	2nd half SPA fee	\$72.00	\$72.00	\$0.00
	2nd half SPA fee penalty	\$0.00	\$0.00	\$0.00
	2ND HALF BALANCE	\$72.00	\$72.00	\$0.00
<b>C100300-Sewer Maintenance</b>	1st half tax	\$46.75	\$46.75	\$0.00
	1ST HALF BALANCE	\$46.75	\$46.75	\$0.00
	2nd half tax	\$46.75	\$46.75	\$0.00
	2nd half penalty	\$0.00	\$0.00	\$0.00
	2ND HALF BALANCE	\$46.75	\$46.75	\$0.00
<b>C100300S-SEWER MAINTENANCE</b>	1st half tax	\$8.25	\$8.25	\$0.00
	1ST HALF BALANCE	\$8.25	\$8.25	\$0.00
	2nd half penalty	\$0.00	\$0.00	\$0.00
	2nd half tax	\$8.25	\$8.25	\$0.00
	2ND HALF BALANCE	\$8.25	\$8.25	\$0.00
		Charges	Payments	Balance Due
Total Balance		\$7,595.74	\$7,595.74	\$0.00